

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA §
§
V. § NO. 4:22CR289
§ (Judge Jordan)
GUY WESLEY REFFITT §

**MOTION FOR CONTINUANCE OF PRETRIAL MOTION DATES,
CHANGE OF PLEA DEADLINE, AND FINAL PRETRIAL CONFERENCE DATE**

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS;

COMES NOW, Defendant, GUY WESLEY REFFITT, by and through his undersigned attorney, and files this, his MOTION FOR CONTINUANCE OF PRETRIAL MOTION DATES, CHANGE OF PLEA DEADLINE, AND FINAL PRETRIAL CONFERENCE DATE, and would show this Honorable Court as follows, to-wit:

I.

PROCEDURAL HISTORY

On January 23, 2023, the Defendant appeared before United States Magistrate Judge Christine A. Nowak for an Initial Appearance and Arraignment on a one-count Indictment, in which the Defendant is charged with a violation of 26 U.S.C. § 5861(d) (Possession of Unregistered Firearm). At that time, the Office of the Federal Public Defender for the Eastern District of Texas was appointed to represent the Defendant.

The deadline to file a continuance or notification of a plea agreement is January 16, 2024, and the Final Pretrial Conference is scheduled for February 5, 2024.

II.

GROUND FOR MOTION

Defense counsel respectfully requests a continuance of the pretrial dates to research some legal and evidentiary issues, to draft pretrial motions, if appropriate, and to discuss all options with the Defendant so that he can make a fully informed decision on how he would like to proceed with his case.

This Motion for Continuance is not made for purposes of delay, but only in order that justice may be done. The Defendant requests that this Court make a finding that “the ends of justice served by taking such action outweigh the best interest of the public and the defendant to a speedy trial.” 18 U.S.C. § 3161(h)(7)(A).

Due to the reasons outlined above, Defendant respectfully requests an additional 60 days for the pretrial motion dates, change of plea deadline, and final pretrial conference date.

WHEREFORE PREMISES CONSIDERED, Defendant respectfully requests that the pretrial motion dates, change of plea deadline, and final pretrial conference date in this case be reset from their current setting for an additional 60 days.

Respectfully submitted,

/s/ Michelle Allen-McCoy
MICHELLE ALLEN-MCCOY
Assistant Federal Defender
Eastern District of Texas
7460 Warren Parkway, Suite 270
Frisco, Texas 75034
(469) 362-8506
FAX: (469) 362-6010

Attorney for Defendant

CERTIFICATE OF CONFERENCE

Prior to filing this motion, I contacted Assistant United States Attorney, William Tatum, and the Government does not oppose this motion.

/s/ Michelle Allen-McCoy
MICHELLE ALLEN-MCCOY
Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of January 2024, a true and correct copy of the foregoing Defendant's MOTION FOR CONTINUANCE OF PRETRIAL MOTION DATES, CHANGE OF PLEA DEADLINE, AND FINAL PRETRIAL CONFERENCE DATE was sent by CM/ECF to:

William Tatum
Assistant U.S. Attorney
600 East Taylor
Suite 2000
Sherman, TX 75090

/s/ Michelle Allen-McCoy
MICHELLE ALLEN-MCCOY
Attorney for Defendant